

The Honorable Barbara J. Rothstein

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

RONALD A. MIKKELSON DDS,

Plaintiff,

v.

ASPEN AMERICAN INSURANCE  
COMPANY,

Defendant.

Civil Action No. 3:20-cv-05378-BJR

**STIPULATED MOTION AND  
ORDER**

1 Plaintiff Ronald A. Mikkelsen, DDS and Defendant Aspen American Insurance Company  
2 stipulate that Defendant shall answer, move, or otherwise respond to Plaintiff's amended  
3 complaint, Dkt. 14, no later than October 27, 2020.

4 WHEREAS:

5 1. On September 9, 2020, Defendant moved to dismiss Plaintiff's lawsuit for failure to  
6 state a claim upon which relief can be granted.

7 2. On September 28, 2020, Plaintiff filed an amended complaint.

8 3. Under the Federal Rules of Civil Procedure, Defendant's response to Plaintiff's  
9 amended complaint is due October 13, 2020.

10 4. On October 7, 2020, counsel for the parties conferred via telephone and discussed  
11 various methods through which this matter and other matters filed against Defendant by Plaintiff's  
12 counsel might be most efficiently organized.

13 5. The parties are continuing to consider and discuss that issue, together with the issues  
14 as to which the Court ordered the parties to meet and confer in its September 29, 2020 Scheduling  
15 Order.

16 6. Further in the interest of efficiency, the parties have agreed to a 14-day extension of  
17 Defendant's response date, pursuant to which Defendant may file its response on or before October  
18 27, 2020.

19 7. The stipulation will not prejudice either party. The parties do not waive any claims  
20 or defenses with this stipulation.

21 IT IS HEREBY STIPULATED AND AGREED, pending the Court's approval, Defendant  
22 shall answer, move, or otherwise respond to Plaintiff's amended complaint by October 27, 2020.

23 ///

24 ///

25 ///

26 ///

27 ///

28 ///

1 The parties respectfully request the Court to enter the accompanying Proposed Order  
2 granting the relief to which the parties have stipulated.

3  
4 DATED this 12th day of October, 2020.

5  
6 KELLER ROHRBACK L.L.P.

SIDLEY AUSTIN LLP

7 /s/ Karin Swope\*

/s/ Robin E. Wechkin

8 Karin Swope, WSBA No. 24015  
9 1201 Third Avenue, Suite 3200  
10 Seattle, WA 98101  
11 Telephone: (206) 623-1900  
kswope@kellerrohrback.com

Robin E. Wechkin, WSBA No. 24746  
SIDLEY AUSTIN LLP  
1420 Fifth Avenue, Suite 1400  
Seattle, WA 98101  
Telephone: (415) 439-1799  
rwechkin@sidley.com

12 ***Attorneys for Plaintiff***

13 *\*Signed with permission.*

Yvette Ostolaza, *pro hac vice*  
Yolanda C. Garcia, *pro hac vice*  
SIDLEY AUSTIN LLP  
2021 McKinney Avenue, Suite 2000  
Dallas, Texas 75201  
Telephone: (214) 981-3401  
Facsimile: (214) 981-3400  
yvette.ostolaza@sidley.com  
ygarcia@sidley.com

17 ***Attorneys for Defendant***

**ORDER**

The Court has considered Plaintiff Ronald Mikkelson DDS and Defendant Aspen American Insurance Company's Stipulated Motion and [Proposed] Order. In light of the parties' continuing discussions of how to efficiently litigate this and other related cases, and the upcoming case management conference to be set by the Court after October 20, *see* Dkt. # 16, the Court **HEREBY ORDERS** that Defendant may answer, move, or otherwise respond to Plaintiff's amended complaint on or before October 27, 2020.

**IT IS SO ORDERED.**

Dated: October 13, 2020.



Honorable Barbara J. Rothstein  
UNITED STATES DISTRICT JUDGE

PRESENTED BY:

DATED this 12th day of October, 2020.

SIDLEY AUSTIN LLP

/s/ Robin E. Wechkin

Robin E. Wechkin, WSBA No. 24746  
SIDLEY AUSTIN LLP  
1420 Fifth Avenue, Suite 1400  
Seattle, WA 98101  
Telephone: (415) 439-1799  
rwechkin@sidley.com

Yvette Ostolaza, *pro hac vice*  
Yolanda C. Garcia, *pro hac vice*  
SIDLEY AUSTIN LLP  
2021 McKinney Avenue, Suite 2000  
Dallas, Texas 75201  
Telephone: (214) 981-3401  
Facsimile: (214) 981-3400  
yvette.ostolaza@sidley.com  
ygarcia@sidley.com

***Attorneys for Defendant***